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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BOARD OF TRUSTEES OF THE
ELECTRICAL WORKERS PENSION
TRUST; and ELECTRICAL WORKERS
PENSION TRUST

Plaintiffs,

vs.

NATIONAL SECURITY
TECHNOLOGIES, LLC, a foreign limited
liability company,

Defendant.

Case No.: 2:21-cv-00062-GMN-BNW

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND DEADLINE TO RESPOND TO
THE COMPLAINT**

Plaintiffs, the Board of Trustees of the Electrical Workers Pension Trust (the “Trustees” or “Board of Trustees”) and the Electrical Workers Pension Trust (the “Trust”) by and through their attorneys of records Adam P. Segal, Esq., and Christopher M. Humes, Esq., of the law firm of Brownstein Hyatt Farber Schreck, LLP and Defendant, National Technologies, LLC (“NST”), by and through its attorneys, Malani L. Kotchka, Esq., of the law firm of Hejmanowksi & McCrea, LLC, hereby stipulate and agree, subject to this Court’s approval, to extend the deadline for NST to file a responsive pleading to the complaint as follows:

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- 1 1. The Trustees and Trust filed the Complaint on January 12, 2021 (ECF No.1).
- 2 2. NST was served with the Complaint and Summons on January 19, 2021 (ECF No.
- 3 5).
- 4 3. NST's responsive pleading is currently due on February 9, 2021.
- 5 4. NST is requesting an extension of time to file a responsive pleading to the
- 6 Complaint until February 16, 2021.
- 7 5. NST's request for an extension of time is to allow out of state counsel to file pro
- 8 hac vice applications with the Court.
- 9 6. The parties agree and hereby stipulate, subject to this Court's approval, that the
- 10 deadline for NST's responsive pleading is extended to February 16, 2021.

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7. The foregoing stipulation is made in good faith and is not made for the purpose of delay or for any other improper purpose.

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

HEJMANOWSKI & McCREA, LLC

/s/ Christopher M. Humes

/s/ Malani L. Kotchka

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Attorneys for Plaintiffs

Attorney for Defendant

Dated: February 4, 2021

Dated: February 4, 2021

ORDER

IT IS SO ORDERED.



UNITED STATES DISTRICT/MAGISTRATE JUDGE

DATED: 2/8/2021

CASE NO. 2:21-cv-00062-GMN-BNW

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